

# **MINOR SOURCE OPERATING PERMIT**

**Indiana Department of Environmental Management  
OFFICE OF AIR QUALITY  
and  
City of Indianapolis Office of Environmental Services  
(OES)**

**Zimmer Custom-Made Packaging  
1450 East 20<sup>th</sup> Street  
Indianapolis, Indiana 46218**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 097-15253-00029	
Issued by:  Originally signed by John B. Chavez  John B. Chavez, Administrator Office of Environmental Services	Issuance Date: 9-22-2003  Expiration Date: 9-22-2008

## TABLE OF CONTENTS

### SECTION A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]
- A.2 Emission Units and Pollution Control Equipment Summary

### SECTION B GENERAL CONDITIONS

- B.1 Permit No Defense [IC 13]
- B.2 Definitions
- B.3 Effective Date of the Permit [IC 13-15-5-3]
- B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)] [326 IAC 2-1.1-9.5]
- B.5 Modification to Permit [326 IAC 2]
- B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]
- B.7 Preventive Maintenance Plan [326 IAC 1-6-3]
- B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]
- B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC 13-30-3-1]
- B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-5(d)(3)]
- B.11 Annual Fee Payment [326 IAC 2-1.1-7]

### SECTION C SOURCE OPERATION CONDITIONS

- C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]
- C.2 Permit Revocation [326 IAC 2-1.1-9]
- C.3 Opacity [326 IAC 5-1]
- C.4 Fugitive Dust Emissions [326 IAC 6-4]
- C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

#### Testing Requirements

- C.6 Performance Testing [326 IAC 3-6]

#### Compliance Requirements [326 IAC 2-1.1-11]

- C.7 Compliance Requirements [326 IAC 2-1.1-11]

#### Compliance Monitoring Requirements

- C.8 Compliance Monitoring [326 IAC 2-1.1-11]
- C.9 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.10 Actions Related to Noncompliance Demonstrated by a Stack Test

#### Record Keeping and Reporting Requirements

- C.11 Malfunctions Report [326 IAC 1-6-2]
- C.12 Emission Statement [326 IAC 2-6]
- C.13 General Record Keeping Requirements [326 IAC 2-6.1-5]
- C.14 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

### SECTION D.1 FACILITY OPERATION CONDITIONS - Flexographic Presses and Faustel Line

#### Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.1.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]
- D.1.2 Pressure Sensitive Tape and Label Surface Coating [326 IAC 12] [40 CFR 60, Subpart RR]
- D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]
- D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

#### Compliance Determination Requirements

- D.1.5 Volatile Organic Compounds (VOC)

## **TABLE OF CONTENTS (Continued)**

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### **D.1.6 Record Keeping Requirements**

## **SECTION D.2 FACILITY OPERATION CONDITIONS - Boilers**

### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

#### **D.2.1 Particulate Matter (PM) [326 IAC 6-2-2]**

## **SECTION D.3 FACILITY OPERATION CONDITIONS - Degreasers**

### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

#### **D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]**

#### **D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]**

Annual Notification  
Malfunction Report

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Indianapolis, Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

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The Permittee owns and operates a stationary printing source.

Authorized Individual:	Central Engineering Manager
Source Address:	1450 East 20 <sup>th</sup> Street, Indianapolis, Indiana 46218
Mailing Address:	1450 East 20 <sup>th</sup> Street, Indianapolis, Indiana 46218
General Source Phone Number:	(317) 263-3436
SIC Code:	2671
Source Location Status:	Marion
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emissions Units and Pollution Control Equipment Summary

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This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) One flexographic press, identified as Unit ID#10, constructed prior to 1977, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 38 inches, with emissions uncontrolled, exhausting to stack S-5.
- (b) One flexographic press, identified as Unit ID#12, constructed prior to 1977, with a maximum operating capacity of 800 feet per minute and a maximum print width of 44 inches, with emissions uncontrolled, exhausting to stack S-6.
- (c) One flexographic press, identified as Unit ID#14, constructed prior to 1977, with a maximum operating capacity of 1,050 feet per minute and a maximum print width of 44 inches, with emissions uncontrolled, exhausting to stack S-7.
- (d) One flexographic press, identified as Unit ID#15, constructed prior to 1977, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 46 inches, with emissions uncontrolled, exhausting to stack S-8.
- (e) One flexographic press, identified as Unit ID#16, constructed in 1991, with a maximum operating capacity of 600 feet per minute and a maximum print width of 45 inches, with emissions uncontrolled, exhausting to stack S-9.
- (f) One CentralFlex Printing press, identified as Unit ID#17, constructed in 1997, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 55.5 inches, with emissions uncontrolled, exhausting to stack S-11.
- (g) One flexographic press, identified as Unit ID#18, constructed in 1999, with a maximum operating capacity of 500 feet per minute and a maximum print width of 22 inches, with emissions uncontrolled, exhausting to stacks S-10, S-11, S-12, S-13, and S-14.

- (h) One flexographic press, identified as Unit ID#19, constructed in 1999, with a maximum operating capacity of 800 feet per minute and a maximum print width of 45 inches, with emissions uncontrolled, exhausting to stacks S-15, S-16, and S-17.
- (i) One Faustel Line, identified as Faustel Line, constructed prior to 1977, with a maximum operating capacity of 400 feet per minute and a maximum print width of 72 inches, exhausting to stack S-10.1.
- (j) One (1) natural gas-fired boiler, identified as Boiler 1, constructed prior to 1977, with a maximum heat input capacity of 11 million British thermal units per hour, exhausting to stack S-1.
- (k) One (1) natural gas-fired boiler, identified as Boiler 2, constructed prior to 1977, with a maximum heat input capacity of 12.5 million British thermal units per hour, exhausting to stack S-2.
- (l) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2] [326 IAC 8-3-5].

## **SECTION B GENERAL CONDITIONS**

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

### **B.1 Permit No Defense [IC 13]**

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

### **B.2 Definitions**

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

### **B.3 Effective Date of the Permit [IC13-15-5-3]**

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

### **B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)] [326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

### **B.5 Modification to Permit [326 IAC 2]**

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

### **B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

and

Indianapolis Office of Environmental Services  
Air Quality Management Section, Permits

2700 South Belmont Avenue  
Indianapolis, Indiana 46221

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.

**B.7 Preventive Maintenance Plan [326 IAC 1-6-3]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Indianapolis Office of Environmental Services  
Air Quality Management Section, Permits  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR 60/63 to have an Operation, Maintenance and Monitoring Plan (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]**

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- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Indianapolis Office of Environmental Services  
Air Quality Management Section, Permits  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-30-3-1]

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, OES, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]  
Pursuant to [326 IAC 2-6.1-6(d)(3)] :

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- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch and OES, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, and OES shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

**B.11 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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- C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]  
Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.
- C.2 Permit Revocation [326 IAC 2-1.1-9]  
Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:
- (a) Violation of any conditions of this permit.
  - (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
  - (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
  - (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
  - (e) For any cause which establishes in the judgment of IDEM and OES, the fact that continuance of this permit is not consistent with purposes of this article.
- C.3 Opacity [326 IAC 5-1]  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.4 Fugitive Dust Emissions [326 IAC 6-4]  
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).
- C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Indianapolis Office of Environmental Services  
Air Quality Management Section, Permits  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos, pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to

thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

## Testing Requirements

### C.6 Performance Testing [326 IAC 3-6]

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Indianapolis Office of Environmental Services  
Air Quality Management Section, Permits  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, and OES if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

## Compliance Requirements [326 IAC 2-1.1-11]

### C.7 Compliance Requirements [326 IAC 2-1.1-11]

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

## Compliance Monitoring Requirements

### C.8 Compliance Monitoring [326 IAC 2-1.1-11]

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

**C.9 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

**C.10 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

**Record Keeping and Reporting Requirements**

**C.11 Malfunctions Report [326 IAC 1-6-2]**

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Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

**C.12 Emission Statement [326 IAC 2-6]**

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate estimated actual emissions of regulated pollutants (as defined by 326 IAC 2-7-1-(32) "Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Indianapolis Office of Environmental Services  
Air Quality Management Section, Permits  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and OES on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

#### C.13 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or OES within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

#### C.14 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Indianapolis Office of Environmental Services

Air Quality Management Section, Permits  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]: Flexographic Presses and Faustel Line

- (a) One flexographic press, identified as Unit ID#10, constructed prior to 1977, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 38 inches, with emissions uncontrolled, exhausting to stack S-5.
- (b) One flexographic press, identified as Unit ID#12, constructed prior to 1977, with a maximum operating capacity of 800 feet per minute and a maximum print width of 44 inches, with emissions uncontrolled, exhausting to stack S-6.
- (c) One flexographic press, identified as Unit ID#14, constructed prior to 1977, with a maximum operating capacity of 1,050 feet per minute and a maximum print width of 44 inches, with emissions uncontrolled, exhausting to stack S-7.
- (d) One flexographic press, identified as Unit ID#15, constructed prior to 1977, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 46 inches, with emissions uncontrolled, exhausting to stack S-8.
- (e) One flexographic press, identified as Unit ID#16, constructed in 1991, with a maximum operating capacity of 600 feet per minute and a maximum print width of 45 inches, with emissions uncontrolled, exhausting to stack S-9.
- (f) One CentralFlex Printing press, identified as Unit ID#17, constructed in 1997, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 55.5 inches, with emissions uncontrolled, exhausting to stack S-11.
- (g) One flexographic press, identified as Unit ID#18, constructed in 1999, with a maximum operating capacity of 500 feet per minute and a maximum print width of 22 inches, with emissions uncontrolled, exhausting to stacks S-10, S-11, S-12, S-13, and S-14.
- (h) One flexographic press, identified as Unit ID#19, constructed in 1999, with a maximum operating capacity of 800 feet per minute and a maximum print width of 45 inches, with emissions uncontrolled, exhausting to stacks S-15, S-16, and S-17.
- (i) One Faustel Line, identified as Faustel Line, constructed prior to 1977, with a maximum operating capacity of 400 feet per minute and a maximum print width of 72 inches, exhausting to stack S-10.1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to flexographic presses #16, #17, #18, and #19 except when otherwise specified in 40 CFR 60, Subpart RR.

#### D.1.2 Pressure Sensitive Tape and Label Surface Coating Operations [326 IAC 12] [40 CFR 60, Subpart RR]

- (a) Flexographic presses #16, #17, #18, and #19 are subject to the requirements of 40 CFR 60, Subpart RR (Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations). Record keeping requirements applicable to these units are included in Condition D.1.7(b) of this section.



- (b) Any change or modification which may increase the input of VOC to flexographic press #16, #17, #18, or #19 to fifty (50) tons per twelve (12) consecutive month period must be approved by IDEM, OAQ and OES before any such change may occur.

**D.1.3 Volatile Organic Compounds (VOC) Content Limitations, Faustel Line [326 IAC 8-2-5]**

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- (a) Pursuant to 326 IAC 8-2-5(b) (Paper Coating Operations), the owner or operator shall not allow the discharge into the atmosphere of VOC from the Faustel Line, a 100% saturation process, in excess of two and nine-tenths (2.9) pounds of VOC per gallon of coating, excluding water, delivered to the coating applicator.
- (b) Compliance with 326 IAC 8-2-5(b) is ensured because the source will use only non-VOC based surface coatings. For any change or modification to use VOC based surface coatings in the Faustel line, the source must receive prior approval from IDEM, OAQ and OES.

**D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]**

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Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the volatile fraction of the ink, as applied to the substrate, shall contain twenty-five percent (25%) by volume or less of volatile organic compounds and seventy-five percent (75%) by volume or more of water for flexographic presses #10, #12, #14, #15, #16, #17, #18, and #19.

**Compliance Determination Requirements**

**D.1.5 Volatile Organic Compounds (VOC)**

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Compliance with the VOC content and usage limitations contained in Condition D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

**D.1.6 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.4, the Permittee shall maintain monthly records of the VOC content of each coating material and solvent used less water.
- (b) Pursuant to 40 CFR 60, Subpart RR, the Permittee shall maintain a twelve (12) consecutive month record of the amount of solvent applied in the coating at flexographic presses #16, #17, #18, and #19.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]: Boilers

- (j) One (1) natural gas-fired boiler, identified as Boiler 1, constructed prior to 1977, with a maximum heat input capacity of 11 million British thermal units per hour, exhausting to stack S-1.
- (k) One (1) natural gas-fired boiler, identified as Boiler 2, constructed prior to 1977, with a maximum heat input capacity of 12.5 million British thermal units per hour, exhausting to stack S-2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.2.1 Particulate Matter (PM) [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2 (Particulate Emission Limitations for Source of Indirect Heating), the particulate emissions from Boiler 1 and Boiler 2 shall each be less than 0.52 pounds per million British thermal unit of heat input.

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]: Degreasers

- (l) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2] [326 IAC 8-3-5].

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
and  
Indianapolis Office of Environmental Services  
AIR QUALITY MANAGEMENT SECTION**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under  
326 IAC 2-6.1-5(a)(5).

<b>Company Name:</b>	<b>Zimmer Custom-Made Packaging</b>
<b>Address:</b>	<b>1450 East 20<sup>th</sup> Street</b>
<b>City:</b>	<b>Indianapolis, Indiana 46218</b>
<b>Phone #:</b>	<b>(317)263-3436</b>
<b>MSOP #:</b>	<b>097-15253-00029</b>

I hereby certify that Zimmer Custom-Made Packaging is ☒ still in operation.  
☐ no longer in operation.

I hereby certify that Zimmer Custom-Made Packaging is ☒ in compliance with the requirements of MSOP  
097-15253-00029.  
☐ not in compliance with the requirements of  
MSOP 097-15253-00029.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>

**MALFUNCTION REPORT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
FAX NUMBER - 317 233-5967  
Indianapolis Office of Environmental Services  
AIR QUALITY MANAGEMENT SECTION**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6  
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ? \_\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE ? \_\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES ? \_\_\_\_\_, 25 TONS/YEAR VOC ? \_\_\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE ? \_\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ? \_\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ? \_\_\_\_\_, 25 TONS/YEAR FLUORIDES ? \_\_\_\_\_, 100 TONS/YEAR CARBON MONOXIDE ? \_\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ? \_\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ? \_\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ? \_\_\_\_\_, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ? \_\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.  
THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR PERMIT LIMIT OF \_\_\_\_\_.  
THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ?    Y        N  
THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ?    Y        N

COMPANY: \_\_\_\_\_ PHONE NO. (    ) \_\_\_\_\_  
LOCATION: (CITY AND COUNTY) \_\_\_\_\_  
PERMIT NO. \_\_\_\_\_ AFS PLANT ID: \_\_\_\_\_ AFS POINT ID: \_\_\_\_\_ INSP: \_\_\_\_\_  
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_ \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_ \_\_\_\_\_ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO<sub>2</sub>, VOC, OTHER: \_\_\_\_\_

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_  
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_  
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_  
INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

**Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

**326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

**326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

**\*Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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**Indiana Department of Environmental Management  
Office of Air Quality**

**and**

**City of Indianapolis  
Office of Environmental Services**

**Addendum to the Technical Support Document  
for Minor Source Operating Permit (MSOP)**

**Source Background and Description**

Source Name: Zimmer Custom-Made Packaging  
Source Location: 1450 East 20<sup>th</sup> Street, Indianapolis, Indiana 46218  
County: Marion  
SIC Code: 2671  
Operation Permit No.: F097-15253-00029  
Permit Reviewer: ERG/AAB

On July 11, 2003, the Office of Air Quality (OAQ) and City of Indianapolis (OES) had a notice published in the Indianapolis Star & News, Indianapolis, Indiana, stating that Zimmer Custom-Made Packaging had applied for a Minor Source Operating Permit (MSOP) to operate a printing source with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

**Comments from EPA**

On July 29, 2003, Ethan Chatfield from EPA Region V submitted comments on the proposed Minor Source Operating Permit. A summary of the comments follows:

**EPA Comment 1:**

Condition D.1.2 and D.1.7(b): The permit conditions listed should be pursuant to 40 CFR 60 subpart RR not RRR. Please revise accordingly.



### **Response to EPA Comment 1:**

Conditions D.1.2 and D.1.7(b) have been corrected as shown below:

#### **D.1.2 Pressure Sensitive Tape and Label Surface Coating Operations [326 IAC 12] [40 CFR 60, Subpart RRR]**

- 
- (a) Flexographic presses #16, #17, #18, and #19 are subject to the requirements of 40 CFR 60, Subpart RRR (Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations). Record keeping requirements applicable to these units are included in Condition D.1.7(b) of this section.
  - (b) Any change or modification which may increase the input of VOC to flexographic press #16, #17, #18, or #19 to fifty (50) tons per twelve (12) consecutive month period must be approved by IDEM, OAQ and OES before any such change may occur.

#### **D.1.7 Record Keeping Requirements**

- 
- (a) ...
  - (b) Pursuant to 40 CFR 60, Subpart RRR, the Permittee shall maintain a twelve (12) consecutive month record of the amount of solvent applied in the coating at flexographic presses #16, #17, #18, and #19.
- ...

### **EPA Comment 2:**

Condition D.2.1: The permit condition contains an emission limitation but no means to ensure compliance. It is suggested that the permit Section be revised to include a record keeping requirement(s) and/or other method(s) to demonstrate compliance.

### **Response to EPA Comment 2:**

For boilers burning fuel oils or coal, IDEM, OAQ and OES require visible emission notations and, in many cases, records of the type and sulfur content of the fuel burned. Since natural gas is a relatively clean burning fuel with low sulfur content, record keeping and monitoring requirements for natural gas-fired boilers are generally considered unnecessary. In the case of Zimmer, the boilers located at this plant burn only natural gas and are relatively small boilers (Boiler 1 has a heat input capacity of 11 MMBtu/hour and Boiler 2 has a heat input capacity of 12.5 MMBtu/hour). Since these boilers were constructed before the applicability date of the New Source Performance Standard 40 CFR 60, Subpart Dc, they are not subject to the requirements of this rule. The only rule they are subject to is 326 IAC 6-2-2. Based on AP-42 emission factors, the particulate matter emissions from these natural gas boilers is well under the PM limit from this rule. Based on a review of Indiana State regulations, compliance monitoring, such as visible emission notations, and monitoring requirements, such as records of the type of fuel burned, are not required for this type of boiler. Therefore, no changes have been made to the permit as a result of this comment.

### **Comments from Zimmer Paper Products**

On July 16, 2003, Zimmer Paper Products submitted comments on the proposed MSOP. The summary of the comments and responses are shown below. Deleted text will be shown as ~~strikeout~~ and new text will be shown as **bold**.

### Comment 1:

The source requested Condition D.1.3 be deleted from the permit because the Faustel Line, which is a 100% saturation process, uses only non-emitting surface coatings on this line, which do not contain any VOCs and HAPs. In addition, the source also requested that references to Condition D.1.3 in Conditions D.1.6 and D.1.7(a) be deleted.

### Response to Comment 1:

Although the Faustel Line uses now non-emitting surface coatings, pursuant to 326 IAC 8-1-1(a), a facility subject to a rule in Article 8 shall "remain subject to such rule notwithstanding any subsequent decrease in VOC emissions". However, since the source will use only non-emitting surface coatings, Condition D.1.3 has been changed to reflect this as shown below. References to Condition D.1.3 in Condition D.1.6 and D.1.7 have been removed. For clarification purposes, the reference to condition D.1.2 as given in D.1.7(a) is incorrect because compliance with D.1.2 is demonstrated by Condition D.1.7(b). The changes are shown below:

#### D.1.3 Volatile Organic Compounds (VOC) Content Limitations, Faustel Line [326 IAC 8-2-5]

(a) Pursuant to 326 IAC 8-2-5(b) (Paper Coating Operations), the owner or operator shall not allow the discharge into the atmosphere of VOC from the Faustel Line, a 100% saturation process, in excess of two and nine-tenths (2.9) pounds of VOC per gallon of coating, excluding water, delivered to the coating applicator.

~~(b) Pursuant to 326 IAC 8-1-2(b), the Faustel Line VOC emissions shall be limited to no greater than the equivalent emissions, expressed in pounds of VOC per gallon coating solids, allowed in (a).~~

~~\_\_\_\_\_ This equivalency was determined by the following equation:~~

~~\_\_\_\_\_ 
$$E = L / (1 - (L/D))$$~~

~~\_\_\_\_\_ Where L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating~~

~~\_\_\_\_\_ D = Density of VOC in coating in pounds per gallon of VOC~~

~~\_\_\_\_\_ E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied~~

~~\_\_\_\_\_ Actual solvent density shall be used to determine compliance of surface coating operation using the compliance methods in 326 IAC 8-1-2(a).~~

~~\_\_\_\_\_ (c) The pounds of VOC per gallon of coating solids shall be limited to less than 4.79.~~

**(b) Compliance with 326 IAC 8-2-5(b) is ensured because the source will use only non-VOC based surface coatings. Any change or modification to use VOC based surface coatings in the Faustel Line, the source must receive prior approval from IDEM, OAQ and OES.**

#### D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions ~~D.1.3 and D.1.4~~ shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

#### **D.1.7 Record Keeping Requirements**

---

- (a) To document compliance with Conditions ~~D.1.2, D.1.3 and D.1.4~~, the Permittee shall maintain **monthly records of the VOC content of each coating material and solvent used less water**. ~~in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.3 and D.1.4. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.~~

#### **Comment 2:**

The source requested the first sentence in Condition C.2 be corrected from "... this permit operate may be revoked..." to "...this permit to operate may be revoked..."

#### **Response to Comment 2:**

Condition C.2 has been corrected as requested by the source. The changes are shown below:

#### **C.2 Permit Revocation [326 IAC 2-1.1-9]**

---

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit **to** operate may be revoked for any of the following causes:

#### **Comment 3:**

The source requested the reference to NSPS standard for Pressure Sensitive Tape and Label Surface Coating Operation as given in permit conditions D.1.2 and D.1.7(b) should be corrected from Subpart RRR to Subpart RR.

#### **Response to Comment 3:**

Conditions D.1.2 and D.1.7(b) have been corrected as shown above in Response to EPA Comment 1.

#### **Comment 4:**

The source requested Condition D.1.5 requiring a preventive maintenance plan for the flexographic printing presses should be deleted because this condition is not required to demonstrate compliance with the VOC content requirements and VOC emission limitations.

#### **Response to Comment 4:**

The purpose of a Preventive Maintenance Plan is to ensure that equipment properly functions and that malfunctions that would cause increased emissions are avoided. The flexographic printing presses are subject to VOC content limits for the inks and record keeping requirements pursuant to the New Source Performance Standard (NSPS) 40 CFR 60.442(a), Subpart RR. Therefore, a preventative maintenance plan does not provide additional assurance that the source is in compliance with the applicable standards and emission limitations. Condition D.1.5 has been removed from the permit as shown below. The Table of Contents has been renumbered as necessary.

#### **~~D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]~~**

---

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.~~

#### **Comment 5:**

The source requested Conditions D.1.7(a)(2), D.1.7(a)(3) and D.1.7(b) be deleted from the permit because the potential to emit VOC from presses #16, #17, #18, and #19 range from 2.57 tons per year to 12.9 tons per year, and is not close to fifty (50) tons per year threshold such that 40 CFR 60.422 would apply. In addition, since the fifty (50) tons per year threshold only relates to solvents applied at each facility, it is unnecessary to maintain records of the amount of clean up solvent used.

#### Response to Comment 5:

Although the potential to emit VOC from each flexographic printing press (identified as #16, #17, #18, and #19) is less than fifty (50) tons per twelve (12) consecutive month period, such that the emission limitations in 40 CFR 60.442 do not apply, pursuant to 40 CFR 60.445(d), the source must maintain twelve (12) consecutive month records of the amount of solvent applied in the coating at each flexographic printing press. Therefore, no change was made to Condition D.1.7(b). However, since compliance with Condition D.1.4 is demonstrated by keeping records of the VOC content of each coating material and solvent used less water, Conditions D.1.7(a)(2), (3), and (4) are not required. Therefore, these conditions have been deleted from the permit as shown below. For clarification purposes, Condition D.1.7 has been renumbered as D.1.6 to reflect the deletion of the Preventive Maintenance Plan as shown in comment 4.

#### D.1.76 Record Keeping Requirements

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- (a) To document compliance with Conditions ~~D.1.2, D.1.3 and D.1.4~~, the Permittee shall maintain **monthly records of the VOC content of each coating material and solvent used less water.** ~~in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.3 and D.1.4. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.~~

~~(1) The VOC content of each coating material and solvent used less water.~~

~~(2) The amount of coating material and solvent used on a monthly basis.~~

~~(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~

~~(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.~~

~~(3) The monthly cleanup solvent usage.~~

~~(4) The total VOC usage for each month.~~

- (b) Pursuant to 40 CFR 60, Subpart RR, the Permittee shall maintain a twelve (12) consecutive month record of the amount of solvent applied in the coating at flexographic presses #16, #17, #18, and #19.

#### Comment 6:

The source requested Condition D.3.1 be deleted from the permit since Condition D.3.2 contains all of the requirements included in Condition D.3.1.

#### Response to Comment 6:

The source is located in Marion County and performs a cold cleaner degreaser operation, which was

installed prior to 1980. It is subject to 326 IAC 8-3-2 (Cold Cleaner Operation) and 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control) because

- (1) It is an existing facility as of January 1, 1980 performing organic solvent degreasing operation in Marion County as described in 326 IAC 8-3-1(a)(1); and
- (2) It is located in Marion County and existing as of July 1, 1990 as described in 326 IAC 8-3-1(b)(1)(A).

No changes have been made to Conditions D.3.1 and D.3.2.

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
Indianapolis Office Of Environmental Services**

**Technical Support Document (TSD) for a Minor Source Operating Permit**

**Source Background and Description**

Source Name: Zimmer Custom-Made Packaging  
Source Location: 1450 East 20<sup>th</sup> Street, Indianapolis, Indiana 46218  
County: Marion  
SIC Code: 2671  
Operation Permit No.: 097-15253-00029  
Permit Reviewer: ERG/KC

The Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) have reviewed an application from Zimmer Custom-Made Packaging relating to the operation of a printing source.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One flexographic press, identified as Unit ID#10, constructed prior to 1977, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 38 inches, with emissions uncontrolled, exhausting to stack S-5.
- (b) One flexographic press, identified as Unit ID#12, constructed prior to 1977, with a maximum operating capacity of 800 feet per minute and a maximum print width of 44 inches, with emissions uncontrolled, exhausting to stack S-6.
- (c) One flexographic press, identified as Unit ID#14, constructed prior to 1977, with a maximum operating capacity of 1,050 feet per minute and a maximum print width of 44 inches, with emissions uncontrolled, exhausting to stack S-7.
- (d) One flexographic press, identified as Unit ID#15, constructed prior to 1977, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 46 inches, with emissions uncontrolled, exhausting to stack S-8.
- (e) One flexographic press, identified as Unit ID#16, constructed in 1991, with a maximum operating capacity of 600 feet per minute and a maximum print width of 45 inches, with emissions uncontrolled, exhausting to stack S-9.
- (f) One CentralFlex Printing press, identified as Unit ID#17, constructed in 1997, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 55.5 inches, with emissions uncontrolled, exhausting to stack S-11.

- (g) One flexographic press, identified as Unit ID#18, constructed in 1999, with a maximum operating capacity of 500 feet per minute and a maximum print width of 22 inches, with emissions uncontrolled, exhausting to stacks S-10, S-11, S-12, S-13, and S-14.
- (h) One flexographic press, identified as Unit ID#19, constructed in 1999, with a maximum operating capacity of 800 feet per minute and a maximum print width of 45 inches, with emissions uncontrolled, exhausting to stacks S-15, S-16, and S-17.
- (i) One Faustel Line, identified as Faustel Line, constructed prior to 1977, with a maximum operating capacity of 400 feet per minute and a maximum print width of 72 inches, exhausting to stack S-10.1.
- (j) One (1) natural gas-fired boiler, identified as Boiler 1, constructed prior to 1977, with a maximum heat input capacity of 11 million British thermal units per hour, exhausting to stack S-1.
- (k) One (1) natural gas-fired boiler, identified as Boiler 2, constructed prior to 1977, with a maximum heat input capacity of 12.5 million British thermal units per hour, exhausting to stack S-2.
- (l) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2] [326 IAC 8-3-5].

#### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

#### **New Emission Units and Pollution Control Equipment Receiving Prior Approval**

There are no new construction activities included in this permit.

#### **Existing Approvals**

The source has constructed or has been operating under the following previous approvals:

- (a) CP099-0029-01 (new construction MSOP), issued April 22, 1999;
- (b) CP097-0029-01, issued December 1, 1997;
- (c) OP097-150029, issued May 21, 1997; and
- (d) OP094-0029-01, issued on April 12, 1994.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not included into this MSOP:

All construction conditions from all previously issued permits.

Reason not incorporated: All facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

## Enforcement Issue

There are no enforcement actions pending.

## Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate	Temperature (°F)
S-1	Boiler 1	34	1.3	1,682 (scfm)	400
S-2	Boiler 2	40	1.5	1,417 (scfm)	420
S-5	Unit ID #10	22	0.75	630 (scfm)	215
S-6	Unit ID #12	24	1.5	1,282 (scfm)	185
S-7	Unit ID #14	24	1.5	1,282 (scfm)	185
S-8	Unit ID #15	20	1.67	1,191 (scfm)	185
S-9	Unit ID #16	20	1.67	1,191 (scfm)	185
S-11	Unit ID #17, Unit ID #18	25	1.0	815	185
S-10, S-12, S-13	Unit ID #18	25	1.0	650	200
S-14	Unit ID #18	25	0.5	Ambient Flow	75
S-15, S-16	Unit ID #19	25	1.0	42 (acfm)	250
S-17	Unit ID #19	25	0.5	Ambient Flow	75
S-10.1	Faustel Line	30	3.0	11,849	325

## Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on November 7, 2001.

## Emission Calculations

See Appendix A (pages 1 through 4) of this document for detailed emissions calculations.

## Potential To Emit (of Source or Revision) Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	0.2
PM-10	0.8
SO <sub>2</sub>	0.1



Pollutant	Potential To Emit (tons/year)
VOC	51.71
CO	8.6
NO <sub>x</sub>	10.3

HAP's	Potential To Emit (tons/year)
Glycol Ether	0.61
Benzene	Negligible
Dichlorobenzene	Negligible
Formaldehyde	Negligible
Hexane	0.19
Toluene	Negligible
Lead	Negligible
Cadmium	Negligible
Chromium	Negligible
Manganese	Negligible
Nickel	Negligible
TOTAL	0.80

Note: Negligible indicates emissions of less than 0.01 tons per year.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are greater than 25 tons per year, therefore, the source is subject to the provisions of 326 IAC 2-6.1.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year, therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (d) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Maintenance Attainment
NO <sub>2</sub>	Attainment
Ozone	Maintenance Attainment
CO	Maintenance Attainment
Lead	Maintenance Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2, and 40 CFR 52.21.

- (b) Marion County has been classified as attainment or unclassifiable for all criteria pollutants and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Total HAPs
Flexographic Presses #10, 12, 14, 15, 16, 17, 18, and 19, and Faustel Line	0	0	0	51.11	0	0	0.61
Natural Gas Combustion (Boiler 1 & Boiler 2)	0.2	0.8	0.1	0.6	8.6	10.3	0.19
Total Emissions	0.2	0.8	0.1	51.71	8.6	10.3	0.80

### Part 70 Permit Determination

#### 326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

### Federal Rule Applicability

- (a) 40 CFR 60, Subpart RR (Standards of Performance For Pressure Sensitive Tape and Label Surface Coating Operations) is applicable to flexographic presses #16, #17, #18, and #19 because they were constructed after the applicability date of December 30, 1980 for this rule. The input of VOC to each of these presses is less than fifty (50) tons per (12) twelve consecutive month period. Therefore, pursuant to 40 CFR 60.440(b), these presses are exempt from the emission limits of 40 CFR 60.442(a), but are subject to all other applicable sections of the rule. Pursuant to 40 CFR 60.445(d), the Permittee

shall maintain a twelve (12) consecutive month record of the amount of solvent applied in the coating at each of these presses.

- (b) 40 CFR 60, Subpart RR (Standards of Performance For Pressure Sensitive Tape and Label Surface Coating Operations) is not applicable to flexographic presses #10, #12, #14, and #15 because these presses were constructed prior to 1977 which is before the applicability date of December 30, 1980 for this rule. 40 CFR 60, Subpart RR is not applicable to the Faustel Line because this line was constructed prior to 1977 which is before the applicability date of December 30, 1980 for this rule and this line does not use VOC.
- (c) 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) is not applicable to Boiler 1 and Boiler 2 even though they both have capacities greater than ten (10) million British thermal units per hour because the boilers were constructed prior to 1977 which is before the applicability date of June 9, 1989 for this rule.
- (d) 40 CFR 60, Subpart QQ (Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing) does not apply to this source because the presses at this source are flexographic, not rotogravure.
- (e) 40 CFR 60, Subpart FF (Standards of Performance for Flexible Vinyl and Urethane Coating and Printing) does not apply to this source because rotogravure printing presses are not operated at this source.
- (f) 40 CFR 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry) does not apply to flexographic presses #10, #12, #14, #15, #16, #17, #18, and #19 even though these presses each meet the definition of a wide-web flexographic press as described in 40 CFR 63.822 because the source does not have the potential to emit ten (10) tons per twelve (12) consecutive month period of a single HAP or twenty-five (25) tons per twelve (12) consecutive month period of any combination of HAPs.
- (g) 40 CFR 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry) does not apply to the Faustel Line because this line does not involve publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses.
- (h) 40 CFR 63, Subpart T (National Emission Standards for Halogenated Solvent Cleaning) does not apply to the insignificant degreasers because the degreasers do not use any solvent containing greater than five (5) percent by weight of any halogenated solvent listed in 40 CFR 63.460(a).
- (i) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because the potential to emit a single HAP is less than ten (10) tons per twelve (12) consecutive month period and the potential to emit any combination of HAPs is less than twenty-five (25) tons per twelve (12) consecutive month period. This source will not be subject to the requirements of 40 CFR 63, Subpart JJJJ (Paper and Other Web Coating) which has not yet been promulgated because it is an area source and area sources are not regulated under this rule.

#### **State Rule Applicability - Entire Source**

##### **326 IAC 2-2 (Prevention of Significant Deterioration)**

In 1977 the following units were constructed: flexographic presses #10, #12, #14, and #15; Faustel Line; and boilers 1 and 2. At that time, the Faustel Line sometimes used solvent borne coatings which resulted in a potential to emit that was greater than the potential to emit shown in

the calculations for this permit. The use of solvent borne coatings resulted in a potential to emit that was greater than two hundred fifty (250) tons per twelve (12) consecutive month period of VOC; therefore, the source was an existing major source when PSD came into affect. Actual emissions never exceeded two hundred fifty (250) tons per twelve (12) consecutive month period.

In 1991, the source constructed flexographic press #16. This facility has the potential to emit 7.85 tons of VOC per year. Therefore, this modification was below PSD significance levels. In 1997, flexographic press #17 was constructed. This press has the potential to emit 3.82 tons of VOC per year and therefore, this construction was below PSD significance levels. In 1999, flexographic presses #18 and #19 were constructed. These presses have the potential to emit 10.97 tons of VOC per year combined. Therefore, this modification was below PSD significance levels. A PSD review has never been required.

During this permitting process, the source decided to remove the option to use solvent borne coatings on the Faustel Line that did not comply with 326 IAC 8-2-5 (Paper Coating Operations). Previously, the source had the option to use noncompliant coatings as long as a thermal oxidizer was operating in order to comply with 326 IAC 8-2-5. This is no longer an option for the source. Therefore, the source now has the potential to emit less than two hundred fifty (250) tons per year and is therefore a PSD minor source.

#### 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)

- (a) The flexographic presses #10, #12, #14, #15, and #16 and the Faustel Line are not subject to the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) because they were constructed prior to July 27, 1997 and do not have the potential to emit greater than ten (10) tons per twelve (12) consecutive month period of a single HAP or greater than twenty-five (25) tons per twelve (12) consecutive month period of any combination of HAPs.
- (b) The flexographic presses #17, #18, and #19 are not subject to the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) even though they were constructed after July 27, 1997 because these facilities do not have the potential to emit greater than ten (10) tons per twelve (12) consecutive month period of a single HAP or greater than twenty-five (25) tons per twelve (12) consecutive month period of any combination of HAPs.

#### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per twelve (12) consecutive month period of both VOC and NO<sub>x</sub> and the source is located in Marion County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

#### 326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**326 IAC 6-1-2 (Nonattainment Area Limitations)**

Zimmer, which is located in Marion County, but is not specifically listed in 326 IAC 6-1-12 (Marion County), does not have the potential to emit greater than one hundred (100) tons per twelve (12) consecutive month period of particulate matter and does not have actual particulate matter emissions of ten (10) tons per twelve (12) consecutive month period. Therefore, this source is not subject to the requirements of 326 IAC 6-1-2 (Nonattainment Area Limitations).

**326 IAC 6-1-12 (Marion County Particulate Limitations)**

326 IAC 6-1-12 (Marion County Particulate Limitations) does not apply to this source because Zimmer is not specifically listed in this rule.

**State Rule Applicability - Presses #10, #12, #14, #15, #16, #17, #18, and #19 and Faustel Line**

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**

Flexographic presses #10, #12, #14, #15, #16, #17, #18, and #19 and the Faustel Line are not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because they do not have the potential to emit particulate.

**326 IAC 8-1-6 (New Facilities; General Reduction Requirements)**

- (a) Flexographic presses #10, #12, #14, and #15 and the Faustel Line are not subject to the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) because each has potential to emit less than twenty-five (25) tons per twelve (12) consecutive month period of VOC and they were constructed before January 1, 1980, the applicability date for this rule. Additionally, flexographic presses #10, #12, #14, and #15 are subject to the requirements of 326 IAC 8-5-5 (Graphic Arts Operations).
- (b) Flexographic presses #16, #17, #18, and #19 are not subject to the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) even though they were constructed after January 1, 1980, the applicability date of this rule because they each have the potential to emit less than twenty-five (25) tons per twelve (12) consecutive month period. Additionally, flexographic presses #16, #17, #18, and #19 are subject to the requirements of 326 IAC 8-5-5 (Graphic Arts Operations).

**326 IAC 8-2-5 (Paper Coating Operations)**

- (a) The Faustel Line is subject to the requirements of 326 IAC 8-2-5 (Paper Coating Operations) pursuant to 326 IAC 8-2-1(a)(1) because it was existing as of January 1, 1980 and the Zimmer source had the potential to emit greater than one hundred (100) tons per twelve (12) consecutive month period of VOC. Additionally, it is subject to the requirements of 326 IAC 8-2-5 because it is a 100% saturation process as described in 326 IAC 8-2-5(a). The Zimmer source no longer has the potential to emit one hundred (100) tons of VOC per twelve (12) consecutive month period, but pursuant to 326 IAC 8-1-1(a), a facility subject to a rule in Article 8 shall "remain subject to such rule notwithstanding any subsequent decrease in VOC emissions."

Pursuant to 326 IAC 8-2-5(b), VOC emissions from the Faustel Line shall not exceed two and nine-tenths (2.9) pounds per gallon of coating, excluding water, delivered to the coating applicator.

Prior to 2002, Zimmer used non-compliant coatings in combination with the operation of a thermal oxidizer. The thermal oxidizer ensured that emissions of VOC were less than 2.9 pounds per gallon. Therefore, Zimmer was in compliance with 326 IAC 8-2-5. Beginning in 2002, Zimmer began complying with 326 IAC 8-2-5 by using compliant coatings with a VOC content below 2.9 pounds per gallon.

- (b) 326 IAC 8-2-5 (Paper Coating Operations) does not apply to flexographic presses #10, #12, #14, #15, #16, #17, #18, and #19 because these units are subject to the requirements of 326 IAC 8-5-5 (Graphic Arts Operations). Pursuant to 326 IAC 8-2-5(a),

facilities meeting the emission limitations in 326 IAC 8-5-5 are excluded from the requirements of 326 IAC 8-2-5.

**326 IAC 8-5-5 (Graphic Arts Operations)**

- (a) Flexographic presses #10, #12, #14, #15, #16, #17, #18 and #19 are subject to 326 IAC 8-5-5 (Graphic Arts Operations) because the Zimmer source was constructed prior to November 1, 1980 and had potential emissions greater than one hundred (100) tons per twelve (12) consecutive month period of VOC. The Zimmer source no longer has the potential to emit one hundred (100) tons of VOC per twelve (12) consecutive month period, but pursuant to 326 IAC 8-1-1(a), a facility subject to a rule in Article 8 shall "remain subject to such rule notwithstanding any subsequent decrease in VOC emissions."

Pursuant to 326 IAC 8-5-5,

- (1) The volatile fraction of the ink, as applied to the substrate, shall contain twenty-five percent (25%) by volume or less of volatile organic compounds and seventy-five percent (75%) by volume or more of water;
- (2) The inks, as applied to the substrate, less water, shall contain sixty percent (60%) by volume or more nonvolatile material;
- (3) The Permittee shall operate a carbon adsorption system, an incineration system, or an alternative volatile organic compound emission reduction system all of which shall achieve a ninety percent (90%) reduction efficiency; or
- (4) The ink, as applied to the substrate, shall meet an emission limit of five-tenths (0.5) pound of volatile organic compound per pound of solids in the ink.

These flexographic presses are in compliance with 326 IAC 8-5-5 because the volatile fraction of the ink, as applied to the substrate, contains twenty-five percent (25%) by volume or less of volatile organic compounds and seventy-five percent (75%) by volume or more of water.

- (b) The Faustel Line is not subject to the requirements of 326 IAC 8-5-5 (Graphic Arts Operations) because it does not involve packaging rotogravure, publication rotogravure, or flexographic printing presses.

**326 IAC 8-6 (Organic Solvent Emission Limitations)**

Flexographic presses #10, #12, #14, #15, #16, #17, #18, and #19 and Faustel Line are not subject to the requirements of 326 IAC 8-6 (Organic Solvent Emission Limitations) even though the source is in Marion County, was existing as of January 1, 1980, and had the potential to emit one hundred (100) tons of VOC per twelve (12) consecutive month period in 1980 because they are "limited by other rules in this article (326 IAC 8)", as stated in 326 IAC 8-6-1(1).

**326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)**

Flexographic presses #10, #12, #14, #15, #16, #17, #18, and #19 and Faustel Line are not subject to the requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) because Zimmer is located in Marion County, not Lake, Porter, Clark, or Floyd Counties.

**State Rule Applicability - Boiler 1 and Boiler 2**

**326 IAC 6-2-2 (Particulate Emission Limitations for Sources of Indirect Heating)**

Boiler 1 and Boiler 2 are subject to the requirements of 326 IAC 6-2-2 (Particulate Emission Limitations for Sources of Indirect Heating) because they are located in Marion County and were in operation in 1977 which is before September 21, 1983. Pursuant to 326 IAC 6-2-2, the

particulate emissions from each boiler (Boiler 1 and Boiler 2) shall be less than 0.52 pounds per million British thermal unit of heat input. This limit was calculated using the following equation:

$$Pt = \frac{0.87}{Q^{0.16}} = \frac{0.87}{(23.5)^{0.16}} = 0.52 \text{ lb PM/MMBtu}$$

Where Pt = pounds of particulate matter emitted per million British thermal unit of heat input (lb/MMBtu)

Q = Maximum operating capacity in million British thermal unit of heat input  
(11 + 12.5 = 23.5 MMBtu/hr)

#### 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Boiler 1 and Boiler 2 are not subject to the requirements of 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) because each boiler has the potential to emit less than twenty-five (25) tons per twelve (12) consecutive month period of sulfur dioxide.

#### State Rule Applicability - Insignificant Degreasers

##### 326 IAC 8-3-2 (Cold Cleaner Operation)

The insignificant degreasers are subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operation) because they were constructed after January 1, 1980. Pursuant to 326 IAC 8-3-2, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operating requirements; and
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

##### 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The insignificant degreasers are subject to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control) because they were constructed after July 1, 1990.

- (a) Pursuant to 326 IAC 8-3-5(a), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.

- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
  - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following requirements are met:
  - (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

## Conclusion

The operation of this printing source shall be subject to the conditions of the attached proposed Minor Source Operating Permit 097-15253-00029.



**Appendix A: Emissions Calculations  
Flexographic Presses**

Page 1 of 4 TSD App A

**Company Name:** Zimmer Custom-Made Packaging  
**Address City IN Zip:** 1450 East 20th Street, Indianapolis, IN 46218  
**Permit Number:** 097-15253-00029  
**Pft ID:** 097-00029  
**Reviewer:** ERG/KC  
**Date:** 08/29/2002

**Ink Coverage**

lbs ink/1000ft <sup>2</sup>	1
% coverage	20

Emission Unit	Line Speed (ft/min)	Printing Width (in)	Maximum Printing Rate (MMin <sup>2</sup> /hr)	Maximum Coverage (lb/MMin <sup>2</sup> )	Max Ink Usage Rate (lbs/hr)	Potential VOC Emissions (lbs/hr)	Potential VOC Emissions (lb/day)	Potential VOC Emissions (ton/yr)	Potential Glycol Ether Emissions (ton/yr)
Flexographic Press #10	1,000	38	27.36	1.39	38	1.23	29.44	5.37	0.05
Flexographic Press #12	800	44	25.344	1.39	35.2	1.14	27.27	4.98	0.05
Flexographic Press #14	1,050	44	33.264	1.39	46.2	1.49	35.79	6.53	0.07
Flexographic Press #15	1,000	46	33.12	1.39	46	1.48	35.63	6.50	0.07
Flexographic Press #17	600	45	19.44	1.39	27	0.87	20.92	3.82	0.04
Flexographic Press #16	1,000	55.5	39.96	1.39	55.5	2.96	70.94	12.95	0.13
Flexographic Press #18	500	22	7.92	1.39	11	0.59	14.06	2.57	0.05
Flexographic Press #19	800	45	25.92	1.39	36	1.92	46.02	8.40	0.16
Total								51.11	0.61

**Presses #10, #12, #14, #15, and #17**

	lb VOC/gal	lb ink/gal	lb VOC/lb ink	Glycol Ether (wt %)
Blue Ink	0.2	7.98	0.03	1.00%
Extender	7.37	7.98	0.92	0.00%
Ink as applied*			0.03	1.00%

**Presses #16, #18, and #19**

	lb VOC/gal	lb ink/gal	lb VOC/lb ink	Glycol Ether (wt %)
Film Ink	0.425	7.98	0.05	1.94%

\*Uses one ounce of extender per gallon of ink

**Methodology**

Maximum Printing Rate (MMin<sup>2</sup>/hr) = Line Speed (ft/min) \* 12 (in/ft) \* 60 (min/hr) \* Printing Width (in) / 10<sup>6</sup> (in/MMin)

Maximum Coverage (lb/MMin<sup>2</sup>) = lbs ink/1000ft<sup>2</sup> \* % Coverage/100 / 144 (in<sup>2</sup>/ft<sup>2</sup>) \* 10<sup>6</sup> (MMin/in)

Maximum Ink Usage Rate (lb/hr) = Maximum Printing Rate (MMin<sup>2</sup>/hr) \* Maximum Coverage (lb/MMin<sup>2</sup>)

Potential VOC Emissions (lb/hr) = Maximum Printing Rate (MMin<sup>2</sup>/hr) \* Maximum Coverage (lb/MMin<sup>2</sup>) \* lb VOC/lb ink

Potential VOC Emissions (lb/day) = Maximum Printing Rate (MMin<sup>2</sup>/hr) \* Maximum Coverage (lb/MMin<sup>2</sup>) \* lb VOC/lb ink \* 24 (hr/day)

Potential VOC Emissions (ton/yr) = Maximum Printing Rate (MMin<sup>2</sup>/hr) \* Maximum Coverage (lb/MMin<sup>2</sup>) \* lb VOC/lb ink \* 8760 (hr/yr) / 2000 (lb/ton)

Potential Glycol Ether Emissions (ton/yr) = Potential VOC Emissions (ton/yr) \* Glycol Ether (wt %)

# Appendix A: Emissions Calculations

Page 2 of 4 TSD App A

## Faustel Line

Company Name: Zimmer Custom-Made Packaging  
Address City IN Zip: 1450 East 20th Street, Indianapolis, IN 46218  
Permit Number: 097-15253-00029  
Plt ID: 097-00029  
Reviewer: ERG/KC  
Date: 08/29/2002

### Ink Coverage

lbs ink/1000ft <sup>2</sup>	5
% coverage	100

Coating Material	Line Speed (ft/min)	Printing Width (in)	Maximum Printing Rate (MMin <sup>2</sup> /hr)	Maximum Coverage (lb/MMin <sup>2</sup> )	Max Ink Usage Rate (lb/hr)	Potential VOC Emissions (lb/hr)	Potential VOC Emissions (lb/day)	Potential VOC Emissions (ton/yr)	Potential HAP Emissions (ton/yr)
Dextrin	400	72	20.74	34.72	720	0	0	0	0
Total							0	0	0

	lbs VOC/gal	lbs ink/gal	lbs VOC/lb ink	HAPs (wt %)
Dextrin	0	10	0	0.00%

### Methodology

Maximum Printing Rate (MMin<sup>2</sup>/hr) = Line Speed (ft/min) \* 12 (in/ft) \* 60 (min/hr) \* Printing Width (in) / 10<sup>0</sup> (in/MMin)

Maximum Coverage (lb/MMin<sup>2</sup>) = lbs ink/1000ft<sup>2</sup> \* % Coverage/100 / 144 (in<sup>2</sup>/ft<sup>2</sup>) \* 10<sup>0</sup> (MMin/in)

Maximum Ink Usage Rate (lb/hr) = Maximum Printing Rate (MMin<sup>2</sup>/hr) \* Maximum Coverage (lb/MMin<sup>2</sup>)

Potential VOC Emissions (lb/hr) = Maximum Printing Rate (MMin<sup>2</sup>/hr) \* Maximum Coverage (lb/MMin<sup>2</sup>) \* lb VOC/lb ink

Potential VOC Emissions (lb/day) = Maximum Printing Rate (MMin<sup>2</sup>/hr) \* Maximum Coverage (lb/MMin<sup>2</sup>) \* lb VOC/lb ink \* 24 (hr/day)

Potential VOC Emissions (ton/yr) = Maximum Printing Rate (MMin<sup>2</sup>/hr) \* Maximum Coverage (lb/MMin<sup>2</sup>) \* lb VOC/lb ink \* 8760 (hr/yr) / 2000 (lb/ton)

Potential Glycol Ether Emissions (ton/yr) = Potential VOC Emissions (ton/yr) \* Glycol Ether (wt %)

**Appendix A: Emissions Calculations**

Page 3 of 4 TSD App A

**Natural Gas Combustion Only****MM BTU/HR <100****Small Industrial Boilers****Company Name: Zimmer Custom-Made Packaging****Address City IN Zip: 1450 East 20th Street, Indianapolis, IN 46218****Permit Number: 097-15253-00029****Plt ID: 097-00029****Reviewer: ERG/KC****Date: 08/29/2002**

11 MMBtu/hr (Boiler 1) + 12.5 MMBtu/hr (Boiler 2) = 23.5 MMBtu (Combined)

**Aggregate**

Heat Input Capacity

Potential Throughput

MMBtu/hr

MMCF/yr

23.5

205.9

**Pollutant**

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.2	0.8	0.1	10.3	0.6	8.6

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

(SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emissions Calculations**

Page 4 of 4 TSD App A

**Natural Gas Combustion Only****MM BTU/HR <100****Small Industrial Boilers****HAPs Emissions****Company Name: Zimmer Custom-Made Packaging****Address City IN Zip: 1450 East 20th Street, Indianapolis, IN 46218****Permit Number: 097-15253-00029****Plt ID: 097-00029****Reviewer: ERG/KC****Date: 08/29/2002****HAPs - Organics**

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.162E-04	1.235E-04	7.720E-03	1.853E-01	3.500E-04

**HAPs - Metals**

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	5.147E-05	1.132E-04	1.441E-04	3.911E-05	2.162E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.